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Commissioner of Patents
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Re: Application/Control Number 10/766,670 Art Unit 2444

Dear Ms. Cloud and Mr. Vaughn.

We are in receipt of the office action dated June 23, 2010. We believe the rejection of all claims 1-57 in our application 10/766,670 is in error. We request reconsideration and further examination in light of the arguments listed below.

The bulk of our application is covered under the prior art of Rai (6,377,982). However, the examiner misses an important distinction between Rai and our application.

Where Rai fails to anticipate the current invention is in terms of roaming where there is no roaming agreement provisioned a-priori. Various places in Rai describe interaction with roaming and accounting systems. The most relevant parts are column 16, lines 40-56 and column 35, line 57 through column 36, line 57.

The network access and roaming system contemplated by Rai functions only when there are roaming agreements between the local provider accessed by the user and that user's home network. In column 16, lines 40-45 Rai notes:

> *In order for this configuration to work, not only must there be roaming agreements between the home and the foreign wireless service providers, but there also must be agreements between the foreign wireless service provider and the end system's internet service provider directly or through an intermediary.*

This directly indicates Rai does not contemplate the portion of the current invention that dynamically and automatically negotiates a roaming agreement on a transient basis where one did not previously exist a-priori.

In column 36, lines 2027, Rai states:

> *In an alternative embodiment, the directory management software incorporates developing standards in the IETF to enable roaming between internet service providers and to enable ISPs to automatically manage and discover roaming relationships. This makes manual*

directory management no longer necessary. The network system automatically propagates roaming relationships, and discovers them, to authenticate and register visiting end systems.

This embodiment of Rai only discovers and propagates *existing* roaming relationships that have been configured and provisioned (but not necessarily established). It does not make any reference to dynamically and automatically creating a roaming relationship on a transient basis (on-the-fly) where one was not previously configured or provisioned.

In many places in Rai, reference is made to the Radius protocol for managing accounting and some aspects of roaming. The Radius standard does not create roaming relationships where one did not exist previously.

In terms of the current invention, we acknowledge prior art and abandon claims 1-13, 15-44 and 46-54, excepting those portions of claim 1 and claim 38 describing the relationship of the automatic roaming system in connection with the system and method for making a roaming connection. If the examiner, upon reconsideration and further examination, agrees the automatic creation of a roaming agreement where one did not previously exists described in our application is not covered by prior art, we will amend our filing to reflect these narrowed claims.

We have responded to the more general issues listed on page 2 and page 3 of the office action as follows:

1) The objection cited for Claim 1, on line 6 related to punctuation has been corrected.
2) An update has been made in response to Exemplary claim 1.
3) An update has been made in response to Exemplary claim 38.
4) An update has been made in response to Exemplary claim 23. HLR has been corrected as HPR.
5) An update has been made in response to Exemplary claim 1 to specifically reference hardware configurations.
6) An update has been made in response to Exemplary claim 53 to specifically reference a non-transitory storage medium.

These changes are noted in the attached patent filing with additions showing underline and deletions as strikeouts.